

THE HONORABLE THOMAS O. RICE

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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON**

ARNAUD WEBER,

Plaintiff,

v.

X CORP., ELON MUSK, LINDA
YACCARINO, and DOES III-V,

Defendants.

Case No. 2-23-cv-00233-TOR

**DECLARATION OF
MICHAEL C. SUBIT IN
SUPPORT OF PLAINTIFF'S
RESPONSE TO DEFENDANT
X CORP.'S MOTION TO
COMPEL ARBITRATION**

DECLARATION OF MICHAEL SUBIT
IN SUPPORT OF PLAINTIFF'S
RESPONSE TO DEFENDANT X CORP.'S MOTION
TO COMPEL ARBITRATION - 1
Case No. 2-23-cv-00233-TOR

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1 I, Michael C. Subit, declare a follows:

2 1. I am a partner at Frank Freed Subit & Thomas LLP and counsel for
3 Plaintiff Arnaud Weber. I am over eighteen years of age, make this declaration
4 based on personal knowledge, and am competent to testify regarding the
5 following facts.
6

7 2. Attached as Exhibit A is a true and correct copy of the Cash Award
8 Offer sent by Twitter's Chief People and Diversity Officer Dalana Brand on July
9 1, 2022.
10

11 3. Attached as Exhibit B is a true and correct copy of the Arbitration
12 Demand I sent via certified mail on behalf of Mr. Weber to Twitter's Legal
13 Department on April 10, 2023.
14

15 4. I did not receive any response to this Arbitration Demand.
16

17 5. Attached as Exhibit C is a true and correct copy of the Demand
18 Letter I sent via certified mail on behalf of Mr. Weber to then-Chief Executive
19 Officer of Twitter, now X Corp., Linda Yaccarino, on June 8, 2023.
20

21 6. I did not receive a response to the Demand Letter to Ms. Yaccarino.

22 7. Attached as Exhibit D is a true and correct copy of the class action
23 complaint in *Woodfield v. Twitter, Inc., et al.*, C.A. No. 1:23-cv-00780-UNA (D.
24 Del. 2023) (ECF No. 1).
25

26
27 DECLARATION OF MICHAEL SUBIT
IN SUPPORT OF PLAINTIFF'S
RESPONSE TO DEFENDANT X CORP.'S MOTION
TO COMPEL ARBITRATION - 2
Case No. 2-23-cv-00233-TOR

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